

5.0 CONSULTATION AND COORDINATION

In addition to this EIS¹, other factors and consultations are considered and play a major role in determining the decision on this proposed lease application. These include the following.

Regional Coal Team Consultation

The Eagle Butte West coal lease application was reviewed and discussed at public meetings held on May 30, 2002, in Casper, Wyoming and on April 27, 2005, in Gillette, Wyoming. FCW presented information about the existing Eagle Butte Mine and the pending lease application to the PRRCT at those meetings. Voting and nonvoting members of the PRRCT include the governors of Wyoming and Montana, the Northern Cheyenne Tribe, the Crow Tribal Council, the USDA-FS, OSM, USFWS, NPS, and USGS. The PRRCT determined that the lands in the application met the qualifications for processing as a production maintenance tract. The PRRCT recommended that the BLM continue to process the Eagle Butte West lease application.

Governor's Consultation

The BLM Wyoming State Director notified the Governor of Wyoming prior to the May 30, 2002 PRRCT public meeting that the Eagle Butte West lease application would be reviewed at the public meeting.

Public Notice

A notice announcing the receipt of the Eagle Butte West coal lease application was published in the *Federal Register* on March 8, 2005. This notice also announced the date, time, and place of the PRRCT meeting to be held on April 27, 2005 to discuss this application. BLM published a Notice of Intent to Prepare an Environmental Impact Statement and Notice of Scoping in the *Federal Register* on May 2, 2005. The publication served as public notice that the Eagle Butte West coal lease application had been received, announced the time and location of a public scoping meeting, and requested public comment on the lease application.

Parties on the distribution list were sent letters in April 2005 announcing the time and location of a public scoping meeting. The public scoping meeting was held on May 17, 2005 in Gillette, Wyoming. At the public meeting, the applicant orally presented information about the Eagle Butte Mine and their need for the coal. The presentation was followed by a question and answer period, during which 22 oral comments were made. The scoping period extended from May 2 through August 1, 2005, during which time BLM received comments from 16 entities.

¹ Refer to page xv for a list of abbreviations and acronyms used in this document.

The EPA published a Notice of Availability for the DEIS in the *Federal Register* on October 20, 2006. The BLM published a Notice of Availability and Notice of Public Hearing for the DEIS in the *Federal Register* on October 20, 2006. The 60-day comment period on the DEIS ended on December 19, 2006. A formal public hearing was held on November 14, 2006, at 7:00 pm at the Clarion Hotel in Gillette, Wyoming to solicit public comments on the DEIS and on the fair market value, the maximum economic recovery, and the proposed competitive sale of coal from the Eagle Butte West LBA Tract. The applicant and one member of the public made statements during the public hearing, and the BLM received eight written comments on the DEIS. The written comments are included, with agency responses, as Appendix I in this FEIS.

Parties on the distribution list will be sent copies of the FEIS when it is completed, and the EPA and BLM will publish a Notice of Availability for the FEIS. After a 30-day availability period, BLM will make a decision to hold or not to hold a competitive lease sale for the federal coal in this LBA tract and a ROD will be signed. Copies of the ROD will be mailed to parties on the mailing list and others who commented on this LBA during the NEPA process. After the ROD is signed, there will be a 30-day appeal period before the ROD is implemented.

Department of Justice Consultation

After a competitive coal lease sale, but prior to issuance of a lease, BLM will solicit the opinion of the Department of Justice on whether the planned lease issuance creates a situation inconsistent with federal anti-trust laws. The Department of Justice is allowed 30 days to make this determination. If the Department of Justice has not responded in writing within the 30 days, BLM can proceed with issuance of the lease.

Other Consultations

Other federal, state, and local governmental agencies that were consulted in preparation of this EIS are listed in Table 5-1.

List of Preparers

This EIS was prepared by WWC Engineering, a third-party contractor, under the direction of the BLM. Representatives from cooperating agencies reviewed and contributed to the EIS. Tables 5-2 and 5-3 provide listings of the BLM, OSM, and WDEQ interdisciplinary team and the third-party consultant personnel who prepared and reviewed this EIS.

Distribution List

This EIS was distributed to Congressional offices, federal agencies, state governments, local governments, industry representatives, interest groups, and individuals for their review and comment (Tables 5-4a and 5-4b).

Table 5-1. Federal, State, Tribal, and Local Governmental Agencies.

Agency or Organization	Individual	Position
Powder River Regional Coal Team	5 Voting Members and 21 Nonvoting Members	
Wyoming Game and Fish Department	Lynn Jahnke Bill Wichers John Emmerich Vern Stelter	Wildlife & Fish Supervisor Deputy Director (DEIS) Deputy Director (FEIS) Wildlife Biologist
Wyoming Department of Environmental Quality/ Air Quality Division	Bernard Daily	Program Manager for New Source Review Program (DEIS)
	Chad Schlichtemeier	Program Manager for New Source Review Program (FEIS)
	Judy Shamley	Senior Analyst (DEIS) Engineering Consultant (FEIS)
		Program Manager for New Source Review Program (DEIS)
	Darla Potter	NEPA & Policy Program Supervisor (DEIS)
	Kelly Bott	NEPA & Policy Program Supervisor (FEIS)
	Cara Keslar	Monitoring Section Manager
Land Quality Division	Kurt King	Senior Analyst
Tribal Governments		
Apache Tribe of Oklahoma	Lower Brule Sioux	
Cheyenne River Sioux	Northern Arapaho	
Comanche Tribe	Northern Cheyenne	
Crow	Oglala Sioux	
Crow Creek Sioux	Rosebud Sioux	
Eastern Shoshone	Santee Sioux	
Flandreau Santee Sioux	Southern Cheyenne/Southern Arapahoe	
Kiowa Tribe	Standing Rock Sioux	

Table 5-2. List of Contributors and Reviewers.

Name	Project Responsibility
BLM Casper Field Office	
Mike Karbs	Project Supervisor
BLM Wyoming State Office	
Bob Janssen	Coal Program Coordination
Janet Kurman	NEPA Coordination
Julie Weaver	Land Adjudication
Susan Caplan	Air Quality and Climate
Rick Schuler	Water Resources
BLM Wyoming Reservoir Management Group	
Dwain McGarry	CBNG Geology
Lee Almasy	CBNG Reservoir Engineering
BLM Buffalo Field Office	
B.J. Earle	Cultural Resources
Larry Gerard	Wildlife Resources
BLM National Science and Technology Center	
Craig Nicholls	Air Quality and Climate
Paul Summers	Water Resources
Campbell County Board of Commissioners	
Marilyn Mackey	DEIS Cooperating Agency Representative
Office of Surface Mining Reclamation and Enforcement Western Region	
Floyd McMullen	DEIS Project Coordinator
Heather Erickson	FEIS Project Coordinator
Wyoming Department of Transportation	
Tim Stark, Cheyenne	Environmental Services/Cooperating Agency Representative
Mark Gillet, Sheridan	District Engineer/Cooperating Agency Representative
Wyoming State Planning Office	
Ben Brandes	DEIS Coal Issues Coordination/Cooperating Agency Representative
Steve Furtney	FEIS Coal Issues Coordination/Cooperating Agency Representative

Table 5-2. List of Contributors and Reviewers (Continued).

Name	Project Responsibility
Wyoming Department of Environmental Quality	
Kathy Muller Ogle – Land Quality Division	CHIA Program Supervisor/Cooperating Agency Representative
Darla Potter – Air Quality Division	DEIS NEPA & Policy Program Supervisor/Cooperating Agency Representative
Kelly Bott	FEIS NEPA & Policy Program Supervisor/Cooperating Agency Representative
ENSR International (Powder River Basin Coal Review)	
Valerie Randall	Project Manager
Dolora Koontz	Assistant Project Manager and Task 2 Manager (Existing Development and Reasonably Foreseeable Development)
Eldon Strid, Matt Reilly	Existing and Projected Coal Development and Coal Transportation Scenarios
Doree Dufresne	Database Development
Bruce MacDonald, PhD	Air Quality
Robert Berry, PhD	Water Resources
James Rumbaugh	Ground Water Modeling
Brad Anderson	Surface Water
Ron Dutton, George Blankenship	Socioeconomics
Bernhard Strom	Land Use, Transportation, and Utilities
William Berg	Topography, Geology, and Minerals
James Burrell, James Nyenhuis	Soils and Alluvial Valley Floors
Jon Alstad	Vegetation, Wetlands, and Grazing
Charles Johnson	Wildlife
Rollin Daggett	Fisheries
Kim Munson	Native American Concerns, and Paleontological Resources

5.0 Consultation and Coordination

Table 5-3. List of Preparers.

Name	Education/Experience	Responsibility
BLM Casper Field Office		
Nancy Doelger	M.S., B.S. Geology, 31 years professional experience	EIS Project Leader/Editor
WWC Engineering Third-Party Contractor		
Ken Collier	B.S. Geology, 29 years professional experience (Licensed Wyoming Geologist)	Project Management Report Preparation
John Berry	B.S. Wildlife Biology, 28 years professional experience	Report Preparation
Heidi Robinson	15 years professional experience	Document Production
Mal McGill	7 years professional experience	CADD/Figure Preparation

Subcontractors for FCW	Responsibility
Habitat Management, Inc.	Vegetation Survey T&E Vegetation Survey Preliminary Wetland Survey
Environmental Solutions, Inc.	Land Use Study
Thunderbird Wildlife Consulting, Inc.	Wildlife Survey T&E Animal Survey
James Nyenhuis	Soil Survey
McVehil-Monnett Associates, Inc.	Air Quality Assessment
ACR Consultants, Inc.	Class III Cultural Resource Survey
Planera, Inc.	Socioeconomic Study
WWC Engineering	Water Resources Study Preliminary AVF Assessment

Table 5-4a. BLM Distribution List for Coal Leasing.

Federal and State Officials

Governor of Montana
 Governor of Wyoming
 US Rep Barbara Cubin
 US Senator John Barrasso
 US Senator Mike Enzi
 Wyoming Representative Timothy Hallinan
 Wyoming Representative Erin Mercer
 Wyoming Representative Sue Wallis
 Wyoming Representative Thomas Lubnau
 Wyoming Representative Dave Edwards
 Wyoming Senator Jim Anderson
 Wyoming Senator John Hines
 Wyoming Senator Michael Von Flatern

Federal Agencies

BLM, Billings MT
 BLM, Buffalo WY
 BLM, Casper WY
 BLM, Cheyenne WY
 BLM, Miles City MT
 BLM, Washington DC
 Bureau of Indian Affairs, Billings MT
 Bureau of Indian Affairs, Washington DC
 Bureau of Reclamation, Denver CO
 Department of Energy, Casper WY
 Department of Energy, Washington DC
 Dept. of Interior Natural Resources Library
 Department of Interior, Denver CO
 Devils Tower National Monument
 EPA Region VIII, Denver CO
 MMS, Denver CO
 MMS, Herndon VA
 NPS, Denver CO
 NPS, Washington DC
 NRCS, Douglas, WY
 OSM, Casper WY
 OSM, Denver CO
 OSM Library, Denver CO
 OSM, Washington DC
 Rocky Mountain Regional Solicitor
 US Air Force
 US Army Corps of Engineers, Cheyenne WY
 US Fish & Wildlife Service, Arlington VA
 US Fish & Wildlife Service, Cheyenne WY
 US Geological Survey, Cheyenne WY
 US Geological Survey, Denver CO
 US Geological Survey, Reston VA
 USDA-FS Douglas Ranger District
 USDA-FS Medicine Bow Forest, Laramie WY
 USDA-FS Rocky Mountain Region, Denver CO

State Agencies

Montana Office of the Governor
 WY Office of the State Treasurer
 WDEQ Air Quality Division
 WDEQ Land Quality Division, Cheyenne WY

WDEQ Land Quality Division, Sheridan WY
 WDEQ Water Quality Division
 WY Business Council/NE Region
 WY Department of Education
 WY Dept of Employment Research & Planning
 WY Dept of Environmental Quality, Director
 WY Dept of Transportation
 WY Division of Economic Analysis
 WY O&G Conservation Commission
 WY Office of State Lands & Investments
 WY Parks & Cultural Resources Dept
 WY State Engineer's Office
 WY State Geological Survey
 WY State Historic Preservation Office
 WY State Inspector of Mines
 WY State Planning Office
 WY Dept of Agriculture
 WY Game & Fish Dept, Cheyenne WY
 WY Game & Fish Dept, Sheridan WY
 WY Game & Fish Dept, Lander WY
 WY Industrial Siting Division
 WY Water Development Commission

Local Government and Agencies

Big Horn County Commission, MT
 Campbell County Conservation District, WY
 Campbell County Commission, WY
 Campbell County School District, WY
 City of Douglas, WY
 City of Gillette, WY
 Converse County Commission, WY
 Converse County Planning Office, WY
 Converse County School District, WY
 Gillette Dept of Community Development, WY
 Powder River County, MT
 Rosebud County Commission, MT
 Town of Wright, WY
 Weston County Commission, WY

Tribal Organizations and Individuals

Apache Tribe of Oklahoma
 Arapahoe Business Council
 Cheyenne River Sioux Tribe
 Comanche Business Committee
 Crow Creek Sioux Tribe
 Crow Tribal Council
 Flandreau Santee Sioux Tribe
 Kiowa Business Committee
 Lower Brule Sioux Tribal Council
 Northern Cheyenne Tribal Council
 Oglala Sioux Tribal Council
 Rosebud Sioux Tribal Council
 Cheyenne-Arapaho Tribe of Oklahoma
 Santee Sioux Tribal Council
 Shoshone Business Council
 Standing Rock Sioux Tribal Council

Table 5-4a. BLM Distribution List for Coal Leasing (Continued).

Organizations

Advisory Council on Historic Preservation
Biodiversity Conservation Alliance
Campbell County Econ Development
CANDO
Fdn for North American Wild Sheep
Izaak Walton League of America
Medicine Wheel Coalition
National Mining Association
National Wildlife Federation
Natural Resources Defense Council
Petroleum Association of Wyoming
Powder River Basin Resource Council
Sierra Club
Thunder Basin Coalition
WY Assoc of Professional Archeologists
Wyoming Bankers Association
Wyoming Business Alliance
Wyoming Mining Association
Wyoming Outdoor Council
Wyoming Stock Growers Association
Wyoming Wildlife Federation
Wyoming Wool Growers Association

Companies/Businesses

Jacobs Ranch Coal Company
All American Equipment
American Colloid Co
Antelope Coal Company
Ark Land Company
Arnjac
Bjork Lindley Little PC
BKS Environmental
BNSF Railway Company
Bridgeview Coal Co
Buckskin Mine
Burns & McDonnell
CE&MT Inc
CH Snyder Company
CONSOL Inc Expl & Land
Cordero Rojo Mine
Decker Coal Co
Dry Fork Coal Company
Ducker Montgomery et al
Environmental Solutions Inc
EOG Resources
Evergreen Enterprises
Foster-Wheeler Environmental
Foundation Coal West Inc
Great Points Energy
Hardin & Associates
Intermountain Resources
Interwest Mining
JIREH Exploration & Consulting
Kenneth R Paulsen Consultants
Kiewit Mining Company
Kiewit Mining Group Inc

Kiewit Mining Properties Inc
KN Energy
LE Peabody & Associates
M&K Oil Company Inc
Marston & Marston
McGraw-Hill
McVehil-Monnett Assoc Inc
Meineadair Consultants
Mine Engineers Inc
Mining Associates of Wyoming
Nerco Coal Company
Norwest Mine Services
P&M Coal Mining Co
Peabody Energy
Powder River Coal Co
Powder River Energy Corp
Rio Tinto Energy America
Riverside Technology Inc
Royal Gold Inc
San Juan Coal Company
Thunder Basin Coal Co
Thunderbird-Jones & Stokes
TRC Environmental
Union Pacific Railroad
URS Greiner Woodward
US West Communications
Western Energy Company
Western Fuels Association
WWC Engineering

Press

Associated Press
Casper Star Tribune
Cheyenne-Wyoming Eagle
Douglas Budget
Gillette News-Record
Rocky Mountain Oil Journal
Western Coal Newsletter

Educational Institutions

CSU Libraries
NWU Policy Research Institute
UW Libraries

Individuals

Barbero, Ralph
Benson, Scott
Bierman, Sheldon
Cundy, Cecil
Daub, Jerry
Glustrom, Leslie
Nyenhuus, Jim
Papp, Alex
Saulcy, Bill
Williams, John
Winland, Mark

Table 5-4b. Eagle Butte Mine Distribution List for Final EIS, Eagle Butte West Coal Lease Application.

Individuals	
Abbott, Susan D Kutz	Fulton, William M III
Allen, Lem B and L F	Geer, Tracey Marie
Anderson, Marsha	Geer, Willis Blaine II
Andresen, Roxanne	Gillett, Mark
Armstrong, Kathryn	Gilsdorf, Joseph M
Baalman, Lynne M & Mark E	Goodman, Kelli R
Ballard, Lexi	Grams, Allen R
Barbour, Margaret L, Trustee,	Grams, Howard L
Barbour, Steven R & Georgia L	Grams, Marilyn F
Batzer, Patricia	Grams, Norman E
Bender, Margaret L & Alfred J	Grams, Raymond
Bergner, Elizabeth S & William S	Gray, Kenn
Beulah Marylander Estate	Gulley, Steven & Candace
Blum, Adam D	Guthrie, Michael T & Gillette Ptnrship
Boldt, Jay James	Haines, Thomas D and Joyce M
Borlz, John	Hanslip, Richard
Bostick, Victoria E	Hanson, Bert C & Betty
Brewer, Shari Ann Yates	Hanson, Bert, Trustee
Bricker, Mark C	Hanson, Daniel P & Kathleen M
Brown, Geraldine	Hardy, Dorothy D
Brown, H Kirk III	Hart, Sharlene K
Carl, Warren L & Joanne	Helsper, Kathleen M
Carlisle, Rochelle L	Hewit, Betty R
Carlson, Norris A & Jane T, Trustees	Hladky, Delano B & Margaret A
Carroll, John	Hladky, Robert G & Shirley
Carter, Wilma McGee	Hoffman, Stan
Chotvacs, Wade R & Margie R	Hogue, Barbara & Charles, Co-Trustees
Clark, Gloria L	Hottell, Skeeter
Cole, Helen	Hoy, Philip L
Cole, Raymond D	Hurm, Dennis D
Coltrane, Mary K Wagensen	Hutchinson, Wendy
Coulter, Milton L	Ilseley, John P and Helen L
Craig, Darrel E	Isenberger, Peg
Croskey, Lois J	Jevas, Mary M
Dabney, Eva L	Johnson, Edith B, Trustee
Dale, George J & Dawn S	Jones, Richard A
Daly, John	Jones, Terry
Davidhizar, Elizabeth A	Jordan, Christine S
Davis, Richard M	Jundt, Josh
Davis, Robert A & Amy L	Kauvar, A J
Dickerson, Lucy H	Keck, Mary V & Cletus J
Dillinger, Lawrence & Shirley A	Kehr, Tom
Drew, Jack A	Kirlough, Marcia A & Thomas A
Dunlap, Charles M	Klein, Blair, Trustee
Dunlap, Larry E/ Virginia/ Katherine, Trustees	Kline, Robert E & Heather
Edwards, Glenn Robert & Jean	Kutz, Albert G
Edwards, Rosemary I	Kutz, Robert M
Erickson, Arnold F & Dixie D	Lasley, Catherine H & James M
Falotico, Anne L & John	Lawson, Wayne H & Deanette A
Fisher, Leslie Jan Wagensen	Lynch, Edward P
Foote, Alvin Dale	Lynde, Judy K
Franklin, Irving Lee & Walter W	Maki, Rodney & Alberta
Fulkerson, James T & Rachel	Marshall, Daniel L
Fulkerson, Richard L	Marshall, Debra S
	Marshall, Joseph L & Betty M
	Martin, Francis S Waslee

Table 5-4b. Eagle Butte Mine Distribution List for Final EIS, Eagle Butte West Coal Lease Application (Continued).

McGee, Carl & Ola Birdsong	Swearngin, Virginia N
McGee, John E	Taylor, William R & Elaine S
Merritt, Gloria	Thrall, Mark
Michelena, Marilyn K & Santiago N	Tolar, Jack L and Ada R
Middleswart, Freda M & Milton	Van Sant, Alta Mae W
Miller, Charles H	VanDegrift, L E
Miller, Douglas D, et al.	Vandekoppel, Clarabel
Miller, Duane R	Vincent, Jeannie J
Miller, Faustine	Vines, W H
Miller, Herbert D & Danene R	Voight, Anne
Miller, Kenneth	Wakefield, W W
Miller, Kenneth L & Kelli M	Wall, Ray Lee
Miller, Mary, Trustee	Ward, Linda G
Miller, Mike W	Watts, Gerald & Wendy
Mills, Don & Jasmine	Weakly, Alan
Mines, David L	Weber, Jeffrey L
Morgan, Jack B, Augusta, & Thomas K	Whitacre, Bette E & Robert W, Trustees
Morrissey, Marge	Wright, Ty C & Gwen H
Morrow, Margaret L & Robert E	Yates, Scott Martin
Nanneman, Gayle & Ginny	Youngberg, Randall M
Nanneman, Virginia	Zarlengo, Richard A & Vincent A
Nichols, Anita Mae	
Nichols, Leonard	Agencies/Businesses/Organizations
Nichols, Leonard L & Nattie Mae	
Nickerson, Albert A., Jr.	Anderman Oils Wyoming, et al.
O'Loughlin, Christopher M	Anderson Minerals Ltd
O'Brien, William E	Apache Corp
Ochs, Anne	AVTAX Inc
Oedekoven, Edna F	Babit Limited Partnership
Oksanen Karla J	Banque Paribas
Oswald, Louis A III, Trustee	Basic Earth Science Systems Inc
Page, Betty J & Charles	Belle Fourche Pipeline Co
Patenaude, Jeanelle F	Blakeman Propane, Inc
Pearson, Robert L	BP Amoco
Persson, Marguerite	Campbell County Airport Board
Podenski, Raymond & Shirley	Gillette-Campbell County Airport
Puckett, Debbie Elder	Citation 1994 Investment Ltd Partnership
Reeves, Antoinette R	Collister Co
Rehbein, Kevin M & Shelly R	Conley P Smith Operating Co
Richards, William B & Karen S	ConocoPhillips
Ritter, Donald A & Eva N	Continental Industries LLC
Roe, Douglas R & Carol M	Continental Oil Co
Rolando, Linda K	Countrywide Home Loans Inc
Rosenberry, Ann M	Devon Energy Corp (Nevada)
Rourke, Paul	EDP Operating Ltd
Sachau, B	Energy Development Partners Ltd
Scheeler, James R & Anita R	Eureka Oil Co
Schlenker, Kenneth A	Express Acquisition Co
Schlidt, Grant G & Shiloh D	Fancher Resources LLC
Scott, Walter & Brownie, Co-Trustees	Federal Aviation Administration
Smith, Jessica	First Interstate Bank of Commerce Trust Dept
Smith, Raymond M, Trustee	First National Bank of Gillette
Stech, Margaret S	Fuller 1999 Family Partnership Ltd
Sterck, Elizabeth	Garland Brothers
Stone, Randy	Gene F Lang & Co
Stroup, Nancy R	Glacier Park Co.
Sullivan, LaMoine C & James F	Guanxi LLC

Table 5-4b. Eagle Butte Mine Distribution List for Final EIS, Eagle Butte West Coal Lease Application (Continued).

Habitat Management Inc	Puma Petroleum Co
Headington Oil Co LP	R & E Thompson & Co
High Plains Associates Inc.	Ranchers Energy Corp
Hi-Pro Production LLC	Samedan Oil Corp
Jim's Water Service Inc	Sharbro Oil Ltd Co
K P Kauffman Co Inc	Shell Mining Co
Karlton Terry Oil Co	Southwest Bank of Texas NA
Kerr McGee Corp	St. Mary Land & Exploration Co
Key Production Co Inc	St. Paul Bank for Cooperatives
Koch Exploration	Star Acquisition III LLC
KPK Inc	Star Investment Corp
Lance Oil & Gas Co Inc	TEAI Oil & Gas Co
Lario Oil & Gas Co	The Daube Co
Madison Co	Tongue River Royalties
Marlin Oil Co LLC	Twenty Mile Land Co
Marquiss Minerals Inc	U S West Communications Inc
MidCon Exploration Co-Exeter	UBS AG Stamford Branch
MIGC Inc/MGTC Inc	Veterans Administration
Miller Properties LLC	WDEQ, Air Quality Division, Sheridan
Nationsbanc Leasing Corp of North Carolina	Wenron Inc
NLB Minerals LLC	Western Co of North America
Norwest Bank Colorado N.A.	Western Fuels
P&L Receivables Co LLC	Westport Oil & Gas Co LP
PAMCO Investments Corp	Wrangler Estates Inc
PD Inc	
Peabody Coal Co	
Presidio of San Francisco	